

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

KYLE SLOAN, Individually, and as
Personal Representative of the Estates
of Rylie Sloan and Jamie Sloan,
KYLE SLOAN as Surviving Spouse
of Jamie Sloan, and KYLE SLOAN as
Surviving Parent of Rylie Sloan; and SUSAN
WEST, Individually; and as the next friend
and natural guardian of K.W., a minor,

Plaintiffs,

v.

NICHOLAS BURIST; LOCKE
RELOCATIONS LLC; MAYFLOWER
TRANSIT LLC; JOE MOHOLLAND, INC.;
AND XYZ COMPANIES 1-3,

Defendants.

CASE NO: 2:22-cv-0076-LGW-BWC

**DEFENDANT MAYFLOWER TRANSIT, LLC'S
UPDATE FOR THE SEPTEMBER 17, 2024, STATUS CONFERENCE**

At the August 27, 2024, hearing, the Court inquired of the process for gathering and producing responsive documents. As noted in the previous update (D.E. 207), Mayflower's search (in the absence of any limiting search terms from Plaintiff) resulted in approximately 16,000 emails, and 9,000 pages total were bates-stamped: CONFIDENTIAL MAYFLOWER004440 – 13476. (Id.). On August 23, 2024, those bates-stamped documents were produced. A privilege log also was generated. The production process is explained below.

Search terms and location of the records

Plaintiffs did not provide any search terms to narrow the search during the meet-and-confer discussions regarding their discovery request. Outside counsel thus directed that Mayflower

search broadly for documents that might be responsive. Consequently, the search included all Outlook e-mail in **3,225** (three thousand two hundred twenty-five) mailboxes based upon the keywords “M00333” or “Moholland”. M00333 is the agency number associated with Moholland in Mayflower’s computer system. Outlook’s content is stored in the cloud by Microsoft.

Timeframe of Mayflower records searched

The emails were gathered for the period of January 1, 2022, through July 15, 2022 (Plaintiff’s Complaint gives the incident date of July 1, 2022). Dawn King, IT Information Security Analyst, completed the work; she is now retired from Mayflower.

How the results were narrowed for production

Due to the size of the document set retrieved, following that voluminous harvest of emails, Mayflower narrowed the documents to responsive documents within the set that merely had the word “Mayflower” or M00333”. At Mayflower, Mark Volansky (Senior Director of Corporate Litigation & Safety Advancement) and Senior Paralegal Lisa Eckelkamp narrowed review based upon the search results, to eliminate both non-responsive and privileged documents.

The following categories were withheld: privileged communications regarding the termination of Moholland’s agency agreement; *internal* communications regarding Mayflower’s administration of cargo claims on Moholland orders (not responsive); *internal* financial and administrative reports where the name Moholland appeared somewhere in the document (not responsive); *internal* communications regarding Moholland shipments before termination (not responsive); *internal* communications by departments regarding the “wind down” of Moholland as an agent (not responsive); and corporate communications (*e.g.*, newsletters, bulletins) transmitted via e-mail where Moholland was identified but not a recipient.

These documents were then reviewed by outside counsel and processed into the production set produced to Plaintiffs (bates-stamped through number MAYFLOWER13476).

Availability of the electronic documents from which the results were generated

The original set of emails arising from the broad “Moholland” and “M00333” search of emails before turnover to outside counsel remains available to Mayflower. Those documents are produceable but will require time due to the volume of documents and mailboxes from which they need to be gathered.

Respectfully submitted this 16th day of September, 2024.

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/s/ Brighten Donner

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CERTIFICATE OF SERVICE

I hereby certify that I have filed and served a copy of the **DEFENDANT MAYFLOWER TRANSIT, LLC'S UPDATE FOR THE SEPTEMBER 17, 2024, STATUS CONFERENCE** on all parties to this action by electronic filing notification.

Respectfully submitted this 16th day of September, 2024.

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